

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

No. 2:23-CR-10

v.

Hon. JANE M. BECKERING  
U.S. District Judge

TODD ALLEN STAFFORD,

Defendants.

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**GOVERNMENT'S POSITION REGARDING THE JOINT PROPOSED JURY  
INSTRUCTIONS**

For the reasons stated in the government's trial brief (R.56, Tr. Br., PageID.138–39), the government does not believe the Court should give the affirmative defense instruction at page 22 of the Joint Proposed Jury Instructions. (R.84, Jt. Proposed JI, PageID.234.) The government otherwise believes that the Joint Proposed Jury Instructions are complete, accurately state the law, and do not need to be supplemented.

Respectfully submitted,

MARK A. TOTTON  
United States Attorney

Dated: March 8, 2024

/s/ Theodore J. Greeley  
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